



**I-95 CORRIDOR
COALITION**

Connecticut DOT
Delaware DOT
DC Dept. of Public Works
Maine DOT
Maryland DOT
Massachusetts Highway Department
New Hampshire DOT
New Jersey DOT
New York City DOT
New York State DOT
Pennsylvania DOT
Rhode Island DOT
Vermont Agency of Transportation
Virginia DOT
Delaware River and Bay Authority
Delaware River Port Authority
Maine Turnpike Authority
Maryland Transportation Authority
Massachusetts Turnpike Authority
New Jersey Highway Authority
New York State Thruway
Pennsylvania Turnpike Commission
Port Authority of NY & NJ
TRANSCOM
Triborough Bridge and Tunnel Authority
AAA Foundation for Traffic Safety
AMTRAK
ATA Foundation
American Bus Association
Association of American Railroads
Coalition of Northeastern Governors
Federal Highway Administration
Federal Railroad Administration
Federal Transit Administration
High Speed Rail Association
ITS America
National Industrial Transportation League
National Private Truck Council
USDOT Office of Intermodalism

October 3, 1996

William F. Caton
Acting Secretary
Federal Communication Commission
1919 M Street, NW, Room 222
Washington, DC 20554

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AUDIO SERVICES DIVISION

RE: Docket #94-102 (Response to Petitions for Reconsideration of the E911 Order)

Dear Mr. Caton:

In response to the Petitions for Reconsideration of the E911 Order (Docket #94-102), the I-95 Corridor Coalition would like to provide some general comments in support of the public interest. The I-95 Corridor Coalition is made up of 12 state departments of transportation and a number of bridge and toll authorities. We cover an area from Virginia to Maine that contains 50 million people. We have contracted with Virginia Tech to study the Mayday/E911 feasibility for the Northeast Corridor. They are following the various national efforts related to Mayday services and beginning efforts to define an operational test for Mayday in the region. This area has a significant interest to the corridor members and the FCC rulemaking will significantly impact the direction we take.

We believe the E911 ruling has significant implications to the transportation user services throughout the region. As a representative of public organizations, our interest is that of the users in our region. We believe, therefore, that the requirements defined in the E911 ruling are vital to obtain a basic level of safety in an increasingly wireless society.

Following are specific responses to certain objections that have been raised:

1. Several parties, including Nokia, Omnipoint, PCIA, TIA and BellSouth, would like the 125 meter/67% accuracy requirement to be reduced or the time period extended. We have identified in our feasibility study many groups that have successfully tested a wide range of technologies that have proven the accuracy requirement is possible currently and need only be brought to deployment. (I-95 Corridor document I-95CC 19-96-02 summarizes many of these operational tests.) Any delay in the current ruling requirements would not be warranted by the facts.

It should be noted that clarification of the accuracy requirement might be in order. Specifically, we would hope that all mobile units be capable of location within 125 meters, 67% of the time. Some are loosely interpreting the requirements as being met by being able to locate 67% of the mobile units with 100% accuracy or some combination of users and accuracy. This could affect the regions in which they choose to deploy the position location capability. They may reason that the rural

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Page 2

regions affect less than 33% of the population so they may not need to deploy it in these areas. We would like to emphasize the need to maintain position location in rural as well as urban environments.

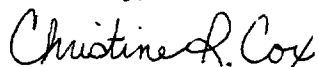
2. Ameritech and TIA asked for clarification on the format in which the information is provided. Much work is being done by Oakridge Labs and the Society of Automotive Engineers (SAE) to develop standards for position location and Mayday message sets and formats to be used. We would encourage this standards process to continue and request the industry to conform to the data formats designated by the Standards Development Organizations (SDO's).
3. Many petitioners have requested that non-service initialized handsets be excluded from the E911 requirements. We agree that some of the performance required in the ruling is not possible to obtain if the handset is not initialized, such as call back; however, this should not prevent the providers from providing other information such as position location on the non-initialized units. We would suggest that the providers be required to provide all components of service to all users unless they can show specifically that a component of the service is not possible. Only then should an individual component be disregarded.
4. Ameritech, PCIA, Omnipoint, AT&T and Primeco have suggested that some form of clarification or modification be made to the references to cost recovery be made to the order. There are two issues that should be clarified: cost distribution and timeframe for implementation.

The first is the distribution of cost for deploying the system. We believe it is necessary for the cost of the service be paid for through an equitable distribution of cost between the service providers and the local authorities.

The second issue to be clarified for cost recovery is the timeframe for implementation. There is no point in requiring that a service provider provide services that cannot be used by the local authorities. This, however, should not be an excuse to do nothing. We believe providers should establish a plan that lays out how they will meet the six-month requirement to deploy once a locality has been appropriately equipped. This plan can be presented when the local funding mechanism is adopted and must be completed when the PSAP system is in place or when the six months has expired, whichever is greater.

Thank you for considering our input.

Sincerely,



Christine R. Cox
Administrative Manager